## Remarks

Claims 15, 17-24, and 26-35 are currently pending. Claim 15 has been amended. No new matter has been inserted. Support for the feature added to claim 15 can be found in the specification at least at page 4, lines 5-11, particularly when considered with the specific examples.

## Kola and Ishihara

The Office Action rejected claim 15 and 17-24 under 35 U.S.C. § 103(a) as obvious over Kola et al. (USPN 6,005,197) and Ishihara et al. (USPN 5,032,694). Applicants respectfully traverse this rejection.

Kola discloses multilevel printed circuit board structures with passive components embedded in interlevel sites. See col. 1, line 5. However, Kola does not disclose a metal oxide adhesive film on a substrate wherein the metal oxide adhesive film does not comprise tantalum as required by independent claim 15.

Ishihara does not cure the deficiencies of Kola. Ishihara discloses a conductive film circuit that has resistance to electric corrosion and a lowered as well as stabilized surface resistance. See col. 1, line 6. Ishihara further discloses the use of a tantalum containing adhesive layer with a tantalum film circuit. See col. 4, lines 29-43. However, Ishihara does not disclose a metal oxide adhesive film on a substrate, wherein the metal oxide adhesive film does not comprise tantalum as required by independent claim 15.

Furthermore, Ishihara only discloses an adhesive between the tantalum circuit and the substrate and between the tantalum circuit and the insulating layer. In contrast, the present invention provides for a first metal electrode film, an inorganic high dielectric film and a second

metal electrode film, all in contact with the metal oxide adhesive film so as to suppress peeling thereof. Finally, since the present invention does not include a tantalum circuit, Ishihara's disclosure of a tantalum-containing adhesive with a tantalum circuit is inapplicable.

Accordingly, the combination of Kola and Ishihara does not teach or suggest the invention of claim 15.

As claims 17-24 are dependent on claim 15, they are also not obvious over Kola and Ishihara. For at least this reason, Applicants respectfully request that this rejection be withdrawn.

## Kola, Ishihara, and Lebow

The Office Action rejected claim 15, 17-24, 26-28, and 30-35 under 35 U.S.C. § 103(a) as obvious over Kola et al. (USPN 6,005,197), Ishihara et al. (USPN 5,032,694), and Lebow et al. (USPN 4,159,222). Applicants respectfully traverse this rejection.

The rejection appears to rely on Lebow for certain aspects of claims 26-28. However, Lebow does not cure the deficiencies of Kola and Ishihara discussed above. Applicants do not concede the correctness of the rejection's use of Lebow.

In light of the foregoing Amendment and Remarks, Applicants' assert the claims are in condition for allowance. Removal of all rejections and early notice of allowable claims is requested.

The Examiner is invited to telephone the undersigned attorney for clarification of any of these remarks or amendments, or to otherwise speed prosecution of this case.

Respectfully submitted,

MERCHANT & GOULD P.C.

P.O. Box 2903

Minneapolis, Minnesota 55402-0903

(612) 332,5300

Dated: Septembr 22,2003

By:

Douglas P. Mueller

Reg. No. 30,300

**CUSTOMER NUMBER 23552** 

DPM:MED:kf